

DRAFT PHASE I RFI/RI WORK PLAN
ROCKY FLATS PLANT WEST SPRAY FIELDS OPERABLE UNIT 11

1. Page 31, Section 3.4. Page 1 of the executive summary indicates that five boreholes and nine surface soil samples will be collected during Phase I Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) activities. Section 3.4 addresses the collection of borehole samples but does not address the collection of the nine surface soil samples. The work plan should provide a rationale for the sample locations, sample densities, sample types (grab or composite), and sampling objectives.

Rationale: The Draft Phase I RFI/RI work plan should be complete and consistent from section to section.

2. Page 38, Section 4.1.4. The method for determining the locations of the 25 subsamples within the 10-acre grid should be presented. Each sample location will be 165 feet apart if the 25 samples were to be spaced equally inside the 10-acre grid. The irrigation lines used in areas one and two had a spray width of 80 feet. The present sampling plan could result in the samples not being collected in the spray areas. The sampling plan should provide a rationale for the sample locations, sample densities, sample types (grab or composite), and sampling objectives.

Rationale: The Draft Phase I RFI/RI work plan should present a sampling plan that will completely characterize the sources of contamination.

3. Appendix A, Figure 4-1. Section 2.3.2 states that the 1986 sampling plot was not in an area of direct spray application but may have been affected by wind dispersion of contaminants or over spray. Analytical results indicate that contaminant concentrations above background levels are present in the 1986 sampling plot. Figure 4-1 does not include this area or other potential run-off and over spray areas in the RFI/RI sampling grids. Any areas potentially affected by run-off or wind dispersion of contaminants should be included in the RFI/RI.

Rationale: The Draft Phase I RFI/RI work plan should address all potential areas of contamination.

4. Appendix A, Figure 5-1. Figure 5-1 indicates that it will take 2 months to perform the radiation walk-over survey and an additional 2 months to collect borehole and surface soil samples. It does not appear reasonable to assume that it will take 2 months to perform the

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aforementioned tasks. The schedule should be revised to provide realistic timing for each individual task.

Rationale: The Draft Phase I RFI/RI work plan should provide a realistic schedule for conducting the investigations.

5. Appendix B, Table 3-2. Table 3-2 is illegible. The table should be reorganized or edited to provide clear and readable text.

Rationale: The Draft Phase I RFI/RI work plan should provide information in a legible format.

6. Appendix B, Table 4-1. The analyte list presented in Table 4-1 should include additional volatile organic compounds (VOCs) that are degradation products of the VOCs currently listed. The additional VOCs should include 1,1-dichloroethylene, 1,2-dichloroethylene, vinyl chloride, and 1,1-dichloroethane.

Rationale: All potential forms of chemical contamination should be included in the analyte list.

7. Appendix E. Appendix E summarizes the characteristics of the liquid waste applied to the west spray fields. The west spray fields were in operation from April 1982 until October 1985. The data summarized in Appendix E are from 1984 to 1988. It appears that only references 1 (undated) and 2 (October 1984 and April 1985) characterize the liquid waste that was actually applied to the west spray field. The extraneous data should be removed or its presence justified.

Rationale: Irrelevant and extraneous data should be justified or removed to avoid confusion.